

CHRISTENSEN JAMES & MARTIN
KEVIN B. CHRISTENSEN, ESQ.
Nevada Bar No. 00175
EVAN L. JAMES, ESQ.
Nevada Bar No. 007760
LAURA J. WOLFF, ESQ.
Nevada Bar No. 006869
7440 W. Sahara Ave.
Las Vegas, NV 89117
(702) 255-1718
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Painters Joint Committee, through its designated
fiduciaries, John Smirk and Thomas Pfundstein;
IUPAT Industry Pension Fund; Employee Painters
Trust Health & Welfare Fund; Painters Vacation-
Holiday Savings Fund; Painters Apprentice
Training Trust Fund; Painters Industry Promotion
Fund; Painters JCIP Fund; Painters Organizing
Fund; and Painters Labor Management Contract
Fund,

Plaintiffs,

v.

J.L. Wallco, Inc. dba Wallternatives, a Nevada
corporation; Genuine Quality Coatings, Inc., a
Nevada Corporation; Sunrise Painting/RCH, Inc., a
Nevada Corporation; Richard Rejan Nieto,
individually and dba Genuine Quality Coatings,
Inc.; Claudia Bammer aka Claudia Nieto, an
individual; Richard Raoul (aka Rqoul) Nieto, an
individual; Great American Insurance Company;
Shrader & Martinez Construction, Inc., a Nevada
corporation; William Nyles Ross dba Quality
Choice Construction; Western Surety Company;
Merchants Bonding Company; John Does I-XX,
inclusive; and Roe Entities I-XX, inclusive,

Defendants.

Case No. 10-cv-1385-JCM-PAL

**STIPULATION FOR
PROTECTIVE ORDER**

Laura J. Wolff, Esq., Zachariah B. Parry, Esq., and Georlen K. Spangler, Esq., for their
respective clients (hereafter "Parties"), hereby stipulate, agree and request this Court's Order, as
follows:

1. On July 19, 2011, the Plaintiffs issued a subpoena to Sherwin-Williams Company that
was subsequently served upon them;

CHRISTENSEN JAMES & MARTIN
7440 WEST SAHARA AVE., LAS VEGAS, NEVADA 89117
PH: (702) 255-1718 & FAX: (702) 255-0871

- 1 2. Thereafter, Sherwin-Williams contacted the Plaintiffs' attorney and requested that a
2 protective order be issued prior to providing the requested documents in order to
3 protect their pricing structure;
- 4 3. The Defendants agreed to stipulate to such so that Sherwin-Williams can produce the
5 requested documents with suitable assurances of confidentiality;
- 6 4. Therefore, the Plaintiffs and Defendants, by and through their respective counsel, do
7 hereby stipulate to enter into a protective order attached hereto as Exhibit "1" for the
8 documents requested from Sherwin-Williams Company, because they may contain
9 sensitive, confidential, financial, private and/or proprietary commercial, personal and
10 trade secret information ("Confidential Information"). However, this Stipulated
11 Protected Order is signed for convenience, and by signing it, no party is agreeing or
12 otherwise admitting that the documents requested from Sherwin-Williams actually
13 contain Confidential Information.

14 DATED October 13th, 2011.

15 CHRISTENSEN JAMES & MARTIN

WOODBURY, MORRIS & BROWN

17 By: /s/ Laura J. Wolff

18 Laura J. Wolff, Esq.

19 Nevada Bar No. 6869

20 7440 W. Sahara Ave.

21 Las Vegas, NV 89117

22 Telephone: (702) 255-1718

23 Attorneys for Plaintiffs

24 KOLESAR & LEATHAM

25 By: /s/ Georlen K. Spangler

26 Georlen K. Spangler, Esq.

27 Nevada Bar No. 3818

28 E. Daniel Kidd, Esq.

 Nevada Bar No. 010106

 400 South Rampart Blvd., Suite 400

 Las Vegas, NV 89145

 Telephone: (702) 889-7726

 Attorneys for Defendants William Nyles Ross

 dba Quality Choice Construction and Western

 Surety Company

By: /s/ Zachariah B. Parry

Zachariah B. Parry, Esq.

Nevada Bar No. 11677

701 No. Green Valley Pkwy., Suite 110

Henderson, NV 89074-6178

Telephone: (702) 933-0777

Attorneys for Defendants Genuine

Quality Coatings, Richard Rejan Nieto,

Richard Raoul Nieto, Claudia Bammer,

Sunrise/RCH, Inc., Great American

Insurance, Shrader & Martinez and

Merchants Bonding Company

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Defendants.

Case No. 10-cv-1385-JCM-PAL

PROTECTIVE ORDER

Having considered the Stipulation for Protective Order between Plaintiffs and Defendants
(Plaintiffs and Defendants are hereafter collectively "Parties"), to enter into a protective order for
certain documents requested from Sherwin-Williams Company, and Good Cause Appearing,
IT IS SO ORDERED:

- 1 1. That the Parties will redact the monetary amounts on any Sherwin-Williams Company
2 document they file with the Court. However, if the monetary amount is relevant then the
3 Parties will file the documents under seal with the Court to protect the integrity of the
4 information.
- 5 2. That the Sherwin-Williams Company documents only be utilized for the purposed of the
6 above-captioned matter and only be made available to the Parties, along with their
7 counsel and any expert retained; and
- 8 3. That any additional party that is not a party to this Stipulation, or entering appearance
9 subsequent to this Stipulation, will only be provided the above-referenced documents
10 after signing an addendum or Amended Stipulation to include that party to this Protective
11 Order prior to receiving a copy of the Sherwin-Williams Company documents.
- 12 4. Nothing in this order shall be construed to preclude any party from independently seeking
13 the documents in any other lawsuit with Sherwin -Williams Company subject to the
14 limitations imposed by the Nevada Rules of Civil Procedure or by local rule.

15 Dated and done this 47^j day of "Qeqdgt, 2011.

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19 United States Magistrate Judge

20
21 Approved and Submitted by:

22 CHRISTENSEN JAMES & MARTIN

23 By: /s/ Laura J. Wolff

24 Laura J. Wolff, Esq.

25 Attorneys for Plaintiffs

26 Approved as to Form and Content:

27 WOODBURY MORRIS & BROWN

28 By: /s/ Zachariah B. Parry

Zachariah B. Parry, Esq.

Attorneys for Defendants

KOLESAR & LEATHAM

By: /s/ Georlen K. Spangler

Georlen K. Spangler, Esq.

Attorneys for Defendants